

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

|   |   |                       |
|---|---|-----------------------|
| WHOLE WOMAN’S HEALTH; <i>et al.</i> ,   | ) |                       |
|   | ) |                       |
| Plaintiffs,                             | ) |                       |
|   | ) | CIVIL ACTION          |
| v.                                      | ) |                       |
|   | ) | CASE NO. 14-CV-284-LY |
| JOHN HELLERSTEDT, M.D.; <i>et al.</i> , | ) |                       |
|   | ) |                       |
| Defendants.                             | ) |                       |

**DECLARATION OF J. ALEXANDER LAWRENCE**

J. ALEXANDER LAWRENCE, declares under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

1. I am a Partner in the law firm Morrison & Foerster LLP (“Morrison & Foerster”). I serve as co-lead counsel for Plaintiffs in this case.

2. I submit this declaration in support of Plaintiffs’ Motion Concerning Enforcement of Order Awarding Attorney’s Fees and Costs.

3. Attached hereto as Exhibit A is a true and correct copy of the Proposed Settlement Agreement and Release in *Cole v. Collier*, 4:14-cv-1698 (S.D. Tex. March 6, 2018) (ECF No. 989-4)

4. Attached hereto as Exhibit B is a true and correct copy of the letter from Esteban S.M. Soto to J. Alexander Lawrence, dated October 3, 2019.

5. Attached hereto as Exhibit C is a true and correct copy of the letter from J. Alexander Lawrence to Esteban S.M. Soto, dated October 15, 2019.

6. Attached hereto as Exhibit D is a true and correct copy of the letter from Esteban S.M. Soto to J. Alexander Lawrence, dated October 25, 2019.

7. Attached hereto as Exhibit E is a true and correct copy of the letter from J. Alexander Lawrence to Esteban S.M. Soto, dated October 30, 2019.

8. Attached hereto as Exhibit F is a true and correct copy of the letter from Esteban S.M. Soto to J. Alexander Lawrence, dated November 6, 2019.

9. Attached hereto as Exhibit G is a true and correct copy of the letter from J. Alexander Lawrence to Esteban S.M. Soto, dated November 12, 2019.

10. Attached hereto as Exhibit H is a true and correct copy of the letter from Esteban S.M. Soto to J. Alexander Lawrence, dated November 14, 2019.

Dated: November 15, 2019

/s/ J. Alexander Lawrence  
J. Alexander Lawrence